

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official  
capacity as President of the United States of  
America, et al.,

Defendants.

NO.

DECLARATION OF  
MARIE-CLAIRE BUCKLEY, MD

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CLAIRE BUCKLEY, MD

ATTORNEY GENERAL OF WASHINGTON  
Complex Litigation Division  
800 Fifth Avenue, Suite 2000  
Seattle, WA 98104  
(206) 464-7744

**DECLARATION OF MARIE-CLAIRE BUCKLEY, MD**

I, Marie-Claire Buckley, declare as follows:

1. I am over the age of 18, competent to testify as to the matters herein, and make this declaration based on my personal knowledge.

2. I am a board-certified plastic surgeon and an Assistant Professor at an academic health facility. I am licensed to practice medicine by the State of Minnesota (#41151).

3. I received my MD from Mayo Medical School in Rochester, Minnesota. I completed general surgery training at Downstate SUNY Health Science Center in Brooklyn, New York. I completed a plastic surgery residency at the University of Minnesota, with a fellowship in pediatric craniofacial plastic surgery at Primary Children's Hospital in Salt Lake City, Utah. I am a member of the World Professional Association for Transgender Health.

4. I entered my current position 2002. I have more than 20 years of experience providing gender-affirming surgical care to patients experiencing gender dysphoria, including trans, genderqueer, and gender non-binary individuals. Providing this care comprises 60-70 percent of my surgical practice. Last year, I performed approximately 200 top surgeries for individuals. Of those 200 surgeries, 25 patients were under age 19. I am the primary provider of this surgical service within the Twin Cities.

5. Patients come to see me because they are experiencing acute distress about the discordance of their physical presentation with their gender identity and sense of self. I am not the first stop on their care journey. Ordinarily my patients have already worked with their primary care providers, endocrinologists, mental health providers, and others to receive gender-affirming care. Many have resorted to binding and other techniques to mask the presence of breasts. These attempts at self-care can lead to soft tissue issues, breathing problems, reduced activity, diminished self-esteem, and withdrawal from athletic and social activities.

6. Before treatment, some of my patients cannot bear to see their own reflection in the mirror; they shower in the dark. Many resort to self-harm, and some present to clinic with

1 scars from their self-harm. Many have experienced suicidal ideation, and some have made  
2 suicide attempts.

3 7. Patients come to me for gender-affirming surgical treatment because they are  
4 hoping to be seen for their true selves. They do not want to be misgendered. They want the  
5 security and acceptance that comes from physically presenting in closer accordance with societal  
6 expectations of their gender identity. Parents of minors seeking gender-affirming surgical care  
7 are seeking to alleviate their child's all-consuming discomfort at having a body that is at odds  
8 with their true self. They see distress, anxiety, withdrawal, fear, and despair in their children who  
9 feel trapped in bodies that do not accord with who they are and who their friends and family  
10 know them to be. They want their children to be able to live full, authentic, emotionally rich  
11 lives.

12 8. Gender-affirming surgical care helps patients to achieve a body congruent to their  
13 gender identity. It allows them to be at home in their body and feel like themselves. Many  
14 benefits flow from this, including improved self-esteem, reduced anxiety and depression, and  
15 better physical and socio-emotional functioning.

16 9. It is my practice to have patients return for a check in approximately one year  
17 after gender-affirming surgical care. Overwhelmingly my patients' lives have greatly improved  
18 after receiving this care. In 22 years of providing this care, performing hundreds of surgeries  
19 each year, only two patients have sought to detransition. Most of my patients report that surgery  
20 has changed their lives for the better. They like being able to swim, to not wear a shirt, to be free  
21 from binding. They love being seen as their authentic selves, and seeing themselves reflected in  
22 the mirror. Their self-esteem is improved, anxiety lowered, and thus social interactions and  
23 overall wellness are enhanced as well.

24 10. I am aware the President of the United States has issued an Executive Order  
25 "Protecting Children from Chemical and Surgical Mutilation," which purports to take several  
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1 steps to disrupt gender-affirming care for people under the age of 19 years. I am very concerned  
2 about the impact of this order on my patients.

3 11. We know the impact of recission of gender-affirming care, because we have  
4 already seen it. Some states across the country have already taken steps to restrict access to  
5 gender-affirming care, and the consequences for trans, gender non-binary and genderqueer  
6 people, and their families, have been excruciating. I have already seen patients who have moved  
7 to Minnesota because they are no longer able to receive medically necessary care in their home  
8 state. These individuals have had to uproot their lives and relocate because they no longer  
9 enjoyed safety, employment, acceptance, or care in their state of origin. It is devastating for these  
10 patients and for their families.

11 12. Many of the children I have treated have already been through so much. They  
12 have scars—physical and mental—from their struggles to be accepted, to present as they see  
13 themselves, to feel confident, to “pass,” to be treated in accordance with basic human dignity.  
14 Their suffering prior to treatment is immense. Treatment is life changing. For these reasons, I  
15 am wholly committed to their care.

16 13. I feel bound to speak out about the harm this Executive Order imposes by  
17 interfering with the delivery of medically necessary care. It is critical that we—the professionals  
18 who have the experience, training, and relationships—be allowed to continue working with  
19 patients to chart appropriate courses of treatment and care. This is not a path that people choose  
20 lightly. The intercession of an Executive Order into this space is amplifying the depression,  
21 anxiety, and pain of my patients. The harm is immense.

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23 I declare under penalty of perjury under law that the foregoing is true and correct.  
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1 DATED and SIGNED this 5th day of February, 2025, in Hennepin County, Minnesota.

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3 *Marie-Claire Buckley, MD*  
4 Marie-Claire Buckley, MD  
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